



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

September 20, 2010

Mr. James Brown  
Alaskan Copper Works  
3600 East Marginal Way  
Seattle, WA 98314-2105

RE: Ecology Response to the Tank Closure Activities Report, Alaskan Copper Works,  
dated June 1, 2010.

Dear Mr. Brown:

Thank you for submitting a copy of the Resource Conservation and Recovery Act (RCRA) Tank Closures Activity Report to the Washington State Department of Ecology (Ecology). Ecology received the report on June 15, 2010.

RCRA clean closure of a dangerous waste generator accumulation tank is a self-implementing regulation where Ecology does not approve work plans/reports or provide any formal oversight. However, Ecology does provide guidance on the closure requirements as we did for your situation. The report states that Alaskan Copper Works conducted RCRA dangerous waste generator closure activities for its dangerous waste accumulation tank, per WAC 173-303-200. Based on the results of the Tank Closures Activity Report, clean closure performance standards were not met for the secondary containment unit and subsurface soils.

Based on the information provided, the Ecology Hazardous Waste and Toxics Reduction (HWTR) Program will not provide formal or direct oversight on further RCRA closure cleanup activities at your Site. Once the site contamination is stabilized (including immediate removal of existing wastes, contaminated debris, and contaminated environmental media to the extent practicable), Alaskan Copper Works should complete RCRA generator closure cleanup actions under the Ecology Toxics Cleanup Program, Model Toxics Control Act (MTCA). This cleanup is usually performed under the voluntary cleanup program (VCP) or as an independent cleanup action.

In summary, the HWTR Program is not approving the recommendations or conclusions in your report, but rather forwarding this information to the Toxics Cleanup Program. Further RCRA cleanup activities should be completed under the Toxics Cleanup Program regulatory framework. For our records, please submit to the HWTR Program a copy of



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all reports submitted to the TCP. Please be aware there are reporting requirements for releases of hazardous substances under the MTCA (Chapter 173-340 WAC).

Please contact me at (425) 649-7264 if you need any clarifications or have any questions regarding this letter.

Sincerely,

A handwritten signature in cursive script that reads "Dean Yasuda".

Dean Yasuda, P.E.  
Environmental Engineer  
Hazardous Waste and Toxics Reduction Program

DY:SA

By certified mail: 7009 2820 0001 7154 0282

cc: Dave Misko, Ecology  
Warren Walton, Ecology  
Donna Musa, Ecology  
Julie Sellick, Ecology